# CITY OF PALM COAST

## **Fire Rescue Impact Fee Study**

Report Draft #2 / Prepared May 19, 2020





May 19, 2020

Honorable Mayor and Members of the City Council City of Palm Coast 160 Lake Avenue Palm Coast, FL 32164

#### Subject: Fire Rescue Impact Fee Study

Honorable Mayor and Members of the City Council:

We have completed our study of the fire and rescue services municipal impact fees for the City of Palm Coast (the "City") and have summarized the results of our analysis, assumptions, conclusions, and recommendations in this letter report, which is submitted for your consideration. This report summarizes the basis for the proposed fire rescue impact fee in order to provide funds to meet the City's capital requirements for such services allocable to customer growth.

During the course of the study, it was determined that the proposed impact fees should meet a number of goals and objectives. These goals and objectives primarily deal with fee sufficiency and level. Specifically, the major objectives considered in this study include:

- The proposed impact fees should be sufficient to fund the projected capital requirements associated with providing service capacity related to new growth and development;
- The proposed impact fees should not be used to fund existing deficiencies in operating or capital needs of the City, if any;
- The proposed impact fees should be based upon reasonable level of service standards that meet the needs of the City and are comparable to industry standards; and
- The proposed impact fees should satisfy the requirements of the Florida Impact Fee Statute 163.31801.

The proposed fire rescue impact fees presented in this report are intended to meet these objectives. As such, based on information provided by City staff and the assumptions and considerations set forth in this report, Raftelis Financial Consultants, Inc. considers the proposed fees to be cost-based, reasonable, and representative of the capital funding requirements of the City's fire rescue services that are related to providing service to new development.

## **IMPACT FEE CRITERIA**

The purpose of an impact fee is to assign, to the extent practical, growth-related capital costs to new development that benefits from the facilities funded by such expenditures. To the extent new population growth and associated development imposes identifiable capital costs on municipal services, equity and modern capital funding practices suggest the assignment of such costs to those new residents or system users responsible for such costs rather than the existing population base. Generally, this practice has been labeled as "growth paying its own way."

The use of impact fees is authorized in the State of Florida by state statute. Section 163.31801 of the Florida Statutes was created on June 14, 2006 and amended in 2009, 2011, and 2019. This section is referred to as the "Florida Impact Fee Act." Within this section, the Legislature finds that impact fees are an important source of revenue for local government to use in funding the infrastructure necessitated by new growth. Section 163.31801 of the Florida Statutes, as amended, further provides that an impact fee adopted by ordinance of a county or municipality or by resolution of a special district must, at a minimum:

- 1. Require that the calculation of the impact fee be based on the most recent and localized data;
- 2. Provide for accounting and reporting of impact fee revenues and expenditures in a separate accounting fund;
- 3. Limit administrative charges for the collection of impact fees to actual costs;
- 4. Require that notice be provided no less than ninety (90) days before the effective date of an ordinance or resolution imposing a new or increased impact fee;
- 5. Collection of the fee may not be required before the issuance of the building permit; and
- 6. Requires an affidavit addressed to the Auditor General that the utility has complied with this statute.

This section is further reinforced through existing Florida case law and the Municipal Home Rule Powers Act that grants Florida municipalities the governmental, corporate, and proprietary powers to enable them to conduct municipal government, perform municipal functions, and render municipal services, as limited by legislation or as prohibited by state constitution or general law. Florida courts have ruled that the Municipal Home Rule Powers Act grants the requisite power and authority to establish valid impact fees. The authority for Florida governments to implement valid system impact fees is further granted in the Florida Growth Management Act of 1985<sup>[1]</sup>.

Based on Section 163.31801 of the Florida Statutes and industry practices, certain conditions are required to develop a valid impact fee. These conditions involve the following issues:

1. The impact fee must meet the "dual rational nexus" test. First, impact fees are valid when a reasonable impact or rationale exists between the anticipated need for additional capital facilities and the growth in population. Second, impact fees are valid when a reasonable association, or rational nexus, exists between the expenditure of the impact fee proceeds and the benefits accruing to new development from those proceeds;

<sup>&</sup>lt;sup>[1]</sup> The Act allows for impact fees under land use regulation by stating:

<sup>&</sup>quot;This section shall be construed to encourage the use of innovative land development regulations which include provisions such as the transfer of development right, incentive and inclusionary zoning, planned unit development, capital charges, and performance zoning." Florida Statutes, Sec. 163.3202(3).

- 2. The system of fees and charges should be set up so that there is not an intentional windfall to existing users;
- 3. The impact fee should only cover the capital cost of construction and related costs thereto (engineering, legal, financing, administrative, etc.) for capacity expansions and capital requirements that are required solely due to growth. Therefore, expenses due to rehabilitation or replacement of a facility serving existing customers (e.g., replacement of a capital asset) or an increase in the level of service should be borne by all users of the facility (i.e., existing and future users). Likewise, increased expenses due to operation and maintenance of that facility should be borne by all users of the facility;
- 4. The impact fee may not be used to pay for existing debt or for previously approved projects unless the expenditure is reasonably connected to the increased capacity requirements generated by new construction; and
- 5. The City should maintain an impact fee resolution that explicitly restricts the use of impact fees collected. Therefore, impact fee revenue should be set aside in a separate account, and separate accounting must be made for those funds to ensure that they are used only for the lawful purposes described above.

Based on the criteria above, impact fees which will be developed in subsequent sections herein: i) will include only the cost of the capital facilities necessary to serve new customer growth; ii) will not reflect renewal and replacement costs associated with existing capital assets of the City; and iii) will not include any costs of operation and maintenance of the facilities.

## **IMPACT FEE METHODS**

There are three methods typically used for the calculation of impact fees. The method that is selected is dependent on the type of fee being calculated (e.g., water, police services, fire services, recreational services, transportation, etc.), cost and engineering data available, and the availability of other local data such as household and population projections, current levels of service, and other related items. These three methods are: i) the improvements-driven approach; ii) the buy-in method; and iii) the standards-driven approach. These methods have been utilized in the development of impact fees for local governments in Florida.

The improvements-driven method is an approach that utilizes a specific list of planned capital improvements over a period of time. For example, the fee may correspond to the level of capital improvements that have been identified in the capital improvements element of the Comprehensive Plan or capital improvement budget of the local government. The buy-in approach utilizes the cost of existing infrastructure. For example, the fee may correspond to the existing assets in service and its availability to serve new growth. The standards-driven method does not utilize the cost of improvements based on specific capital investment or needs but rather on the theoretical cost of the improvements to capital facilities for incremental development based on standards established by the local government. For example, the standards-driven method for a transportation impact fee would consider the theoretical cost of a mile of a new road by the trip capacity of a mile of road to establish the cost per trip. The primary difference between the three methodologies is how the capital costs, which must be recovered from the application of the fee, are calculated.

The proposed impact fee for fire rescue services is based on a combination of the improvements-driven method and buy-in method. This methodology reflects capacity available from existing facilities, which are currently in service and able to meet near-term growth requirements and incremental costs for new facilities to derive a cost allocable to new growth.

## **LEVEL OF SERVICE STANDARDS**

The City's targeted level of service standard for fire rescue service is for first responders to arrive on scene at incidents within 7 minutes or less, 85% of the time from the time of the first alarm. The City currently staffs 77 fire rescue personnel or approximately 0.85 firefighters per 1,000 people. In addition to these fire personnel, the City is planning on adding additional staffing and facilities to meet their service standard target as the City expands towards buildout.

## **POPULATION FORECAST**

Regardless of the approach taken to formulate impact fees, it is necessary to consider the forecast of the City's population which corresponds to the residential dwelling units and developed non-residential square footage in the City. Other considerations include determining the appropriate planning horizon to ensure that capital improvement needs and costs are apportioned over an appropriate growth segment.

As shown below, the estimated total current count of the City's residential dwelling units is 39,163 and current non-residential square footage is about 7,203,693 square feet. Based on information provided by the City regarding projected development, it is estimated that the total amount of residential dwelling units will approach approximately 80,987 at buildout. The current relationship of non-residential square footage to residential dwelling units is approximately 184 sq. ft per unit. This relationship was held constant and used to estimate the projected growth of non-residential square footage through buildout. It is this buildout level that is then used in the development of the fee as shown later in this report.

Current and	Current and Projected Residential Dwelling Units and Non-Residential Square Footage [1]			
Year	Total Residential Dwelling Units	Total Non-residential Square Footage	Average Annual Historical Population Growth Rate	
2020	39,163	7,203,693	2.12%	
Buildout [2]	80,987	14,896,672	N/A	

[1] Amounts shown obtained from the U.S. Census Bureau and from information and discussions with City staff. See Table 1 at the end of this report.

[2] Buildout amount shown does not include 12,000 units associated with Neoga Lakes and Old Brick Township per discussions with the City.

To the extent the estimated future buildout assumptions materially change, it would then be appropriate for the City to reevaluate the impact fees developed in this report.

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## **EXISTING FIRE RESCUE ASSETS**

In the development of the fee, the original costs of the existing assets and any grant funding or contributions towards those assets were considered. The City's existing assets are categorized by major type and are summarized below.

Inventory of City Fire Rescue Facilities [1]		
Description	<b>Original Cost</b>	
Fire Stations (5)	\$11,777,080	
Vehicles	5,118,564	
Machinery and Equipment	1,282,894	
Sub Total	\$18,178,539	
Grant Funded Facilities	(1,460,743)	
Net Recoverable Costs	\$16,717,796	

[1] Amounts as shown on Table 3.

As shown above, of the \$18,178,539 in fire rescue assets, \$16,717,796 is included in the calculation of the impact fee as a result of the City obtaining \$1,460,743 in grant funding and capital contributions which offset the capital cost to the City.

## **CAPITAL IMPROVEMENT REQUIREMENTS**

In the development of the proposed fee, the following capital improvement requirements were provided by the City. Along with the City's existing investment in fire rescue assets, these capital requirements are anticipated and designed to expand the department's ability to provide service to the City's buildout population level and fulfill the identified level of service standards. The City's capital requirements are categorized by type of expenditure and are summarized below.

Projected Future City Investment in Recreational Facilities and Activities (Capital Pla	n) [1]
Description	Amount
3 Additional Full-Size Fire Stations (W/ Supporting Vehicles)	\$14,925,000
Training Facility	3,500,000
2 Mini Fire Stations (W/ Supporting Vehicles)	2,500,000
Personnel Related Equipment and Other Machinery	979,353
Total Future City Investment in Fire Rescue Facilities	\$21,904,353

[1] Amounts as provided by City staff and are shown on Table 4.

As can be seen above, the City anticipates spending \$21,904,353 in order to further develop the fire rescue facilities to provide the desired level of service to the City as it grows to buildout.

## **DESIGN OF FIRE RESCUE IMPACT FEE**

The method used to determine the impact fee is a combination of the improvements-driven method and buy-in method as the recoupment of a portion of existing investments available to serve new growth and the costs associated with adding additional capacity to serve the City's future needs are recognized. Table 3 at the end of this report summarizes the results of the impact fee calculation. The following is a brief description of the method used in this study:

- Development of Total Capital Need Based on discussions with the City and the level of service requirements related to the maintenance of first response time, the existing and planned future facilities and related costs to serve the population reflected in the analysis was developed.
- Allocation of Costs to Customer Class This step allocated the identifiable capital costs for maintaining the targeted LOS to the customer classes. The allocation was based on actual call data provided by the department. This is the parameter used as the link between the need and the cost.
- Development of Equivalent Impact Fee Units This data was provided by Staff in the form of the City's anticipated "buildout" dwelling unit capacity and existing non-residential square footage. These figures are used to develop a proposed fee per dwelling unit.
- Calculation of Cost per Dwelling Unit Once the total capital costs and the equivalent impact fee units were determined, the cost per equivalent unit was calculated.

## **PROPOSED IMPACT FEE CALCULATION**

The first step in calculating the new impact fee is to determine which capital costs are to be recovered from each customer class (i.e. residential and non-residential). An equitable method of determining this allocation factor is to base it on the actual service requirements of each class or specifically, the number of calls to residential versus non-residential properties. Based on a 3-year average of call data provided by the City, the following allocation factor was determined:

Development of Cost Recovery Allocation Factor [1]				
Description Residential Commercial Total				
Average Annual Calls	6,536	1,955	8,491	
Percent of Total Calls	76.98%	23.02%	100.00%	

[1] Based on 2017-2019 call data provided by the City as summarized on Table 5.

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Based on the assumptions discussed and outlined in this report, the fire rescue impact fees as set forth in detail on Table 7 were determined as follows:

Description	Amou	nt [1]
Net City Investment in Fire Rescue Capital		\$16,717,796
Total Future City Investment in Fire Rescue Capital		21,904,353
Net Capital Costs		\$38,622,149
Cost Recovery Allocation Factor (Res. / Non-res.)	76.98%	23.02%
Net Allocated Facilities Cost	\$29,731,305	\$8,890,844
Total Buildout Residential Units / Non-res. Sq. Ft	80,987	14,896,672
Total Costs to be Recovered per Unit / Sq. Ft (Rounded)	\$367.00	\$0.59

[1] Amounts as shown on Tables 6 and 7.

The proposed rate per dwelling unit is applied to the residential development (single-family, multi-family, and mobile homes).

## **IMPACT FEE COMPARISONS**

In order to provide the City additional information about the proposed impact fees, a comparison of the proposed fees for the City and those charged by other jurisdictions was prepared. Table 8 at the end of this section summarizes the impact fees for fire rescue services charged by other communities with the proposed rates of the City. Please note that each community may establish a different level of service standard to meet its vision of the needs for recreation facilities and activities. The City can anticipate variances between other communities.

## **CONCLUSIONS AND RECOMMENDATIONS**

Based on our analyses of the current fire rescue asset data, projected capital improvements plan, and discussions with City Staff, Raftelis recommends adopting a fire rescue impact fee to \$367.00 per dwelling unit for residential customers and \$0.59 per square foot for non-commercial customers. This proposed fee would increase the fee currently charged to new residents by \$110.62 per dwelling unit or \$0.2568 per square foot of non-residential development. Additionally, Raftelis recommends that the City consider developing and incorporating an indexing provision to increase the fees annually in order to keep pace with inflation, as well as review and update its impact fee calculations and overall methodology every three to five years.

The proposed fire rescue impact fee presented in this report should meet the study objectives, as identified by the City and provide a defensible impact fee based on industry norms, and the requirements of the Florida Statutes regarding impact fees. As such, based on information provided by the City and the assumptions and considerations reflected in this report, Raftelis Financial Consultants, Inc. considers the proposed fees to be cost-based, reasonable, and representative of the funding requirements of the City.

We appreciate the cooperation and assistance given to us by the City and its staff in the completion of the study.

Very truly yours,

Raftelis Financial Consultants, Inc.

Henry L. Thomas Vice President

Shawn A. Ocasio Senior Consultant

HLT/sao Attachments

### CITY OF PALM COAST, FLORIDA

### FIRE RESCUE IMPACT FEE STUDY

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# Table 1City of Palm CoastFire Rescue Impact Fee Study

### **Population Detail and Housing Elements**

		Annual			
Line		Average	Total	Total	Avg. Pop.
No.	Fiscal Year	Rate	Population [1][2]	Units [3]	per Unit [4]
1	2000	N/A	32,732	14,929	2.19
2	2010	8.7%	75,180	35,058	2.14
3	2016	1.6%	82,760	35,820	2.31
4	2017	2.19%	84,575	36,772	2.30
5	2018	2.12%	86,370	37,552	2.30
6	2019	2.12%	88,204	38,349	2.30
7	2020	2.12%	90,076	39,163	2.30
8	2025	4.20%	110,640	48,104	2.30
9	2030	3.13%	129,064	56,115	2.30
10	2035	2.63%	146,960	63,896	2.30
11	2040	1.53%	158,577	68,947	2.30
12	Buildout	N/A	186,270	80,987	2.30
13	Overall 2020 - 2040	2.87%			

#### Footnotes

[1] Historical values for 2000 and 2010 were based on the 2000 and 2010 U.S. Census reported values. Values for 2016 and 2017 as obtained from the U.S. Census Bureau estimates and City's Comprehensive Annual Financial Reports.

[2] Projected population values for 2020 through 2040 were based on projections as provided by the City.

[3] Historical units based on Census information and projected based on estimate of average population per dwelling unit.

[4] Historical 2000 and 2010 values based on reported Census values. 2016 and 2017 values were based on 5 year average estimates as found on the Census Bureau's American Community Survey for the 5 year periods of 2012 - 2016 and 2013 - 2017, respectively.

# Table 2City of Palm CoastFire Rescue Services Impact Fee Study

### Summary of Existing Personnel

Line		FY 2020 Budgeted	Allocation to Fu	Achieved
No.	Description	Staff [1]	Basis	LOS
	Personnel			
1	Fire Chief	1.00		
1		1.00		
2	Deputy Fire Chief	1.00		
3	Fire Marshal	1.00		
4	Fire Captain	3.00		
_		0.00		
5	Fire Lieutenant / Paramedic	8.00		
6	Fire Lieutenant	7.00		
0	The Eleuchant	7.00		
7	Firefighter / Paramedic	23.00		
	C			
8	Firefighter / EMT	13.00		
9	Volunteers - Fire Suppression	20.00		
10	T. 4.1 D	77.00	<b>D</b> 4 666 <b>D</b> 4 4	
10	Total Personnel	77.00	Per 1,000 Population	0.85
	Support			
11	Administrative Assistant & Staff Assistant	2.00		
11	Administrative Assistant & Stari Assistant	2.00		
12	Volunteers - Non Fire Suppression	30.00		
		20100		
13	Total Support	32.00		
	Total			
14	Firefighter/Rescue Division	109.00		

Footnotes:

[1] Per personnel listing as obtained from City Staff.

# Table 3City of Palm CoastFire Rescue Services Impact Fee Study

### Summary of Existing Capital Equipment, Vehicles, and Facilities

Line No.	Description	Historical Cost [1]
	Machinery and Equipment	
1	Existing Machinery and Equipment	\$768,144
2	Fire Fighter Equipment - Structural PPE, Uniforms, Thermal Imager	514,750
3	Total Machinery and Equipment	\$1,282,894
	<u>Vehicles</u>	
4	Tower Truck Sph 100 Ft 2000Gpm	\$969,082
5	Fire Truck Marauder 2 100 Ft Aerial	623,652
6	Typhoon Customer Pumper	526,186
7	Fire Truck Enforcer 1250 Gpm	384,138
8	Fire Truck Enforcer 1250 Gpm	384,138
9	Pumper Arrow Xt 1500 Gpm	374,238
10	Rosenbauer Fire Truck	354,859
11	Rosenbauer Commercial Chassis Fire Appar	259,345
12	Fire Truck Flame 1250 Gpm	259,254
13	Rosenbauer Pumper	256,678
14	Rosenbauer Pumper	256,678
15	All Other Vehicles	470,316
16	Total Vehicles and Firefighting Equipment	\$5,118,564
	Other Capital Equipment and Required Facilities	
17	Buildings and Land	Historical Cost [1]
18	Fire Station 21	\$3,505,344
19	Fire Station 22	342,940
20	Fire Station 23	1,125,942
21	Fire Station 24	2,533,353
22	Fire Station 25	4,101,806
23	Land	167,697
24	Total Other Fire Department Equipment and Required Facilities	\$11,777,080
25	Total Existing Capital Equipment, Vehicles & Facilities	\$18,178,539
26	Recognition of Capital Grants and Contributions	(\$1,460,743)
27	Total Existing Capital Equipment, Vehicles & Facilities	\$16,717,796

#### Footnotes:

[1] Amounts reflected as provided by the City as of September 30,2019.

# Table 4City of Palm CoastFire Rescue Services Impact Fee Study

### **Proposed Capital Equipment, Vehicles, and Facilities**

Line No.	Description	Total
1	Future New Equipment Vehicles and Escilities	
1	Future New Equipment, Vehicles, and Facilities	
2	Station - Seminole Woods	\$4,225,000
3	Fire Engine - Class A Pumper	525,000
4	Brush Attack	140,000
5	Utility Vehicle	85,000
6	Station - Colbert Lane / State Road 100	4,225,000
7	Fire Engine - Class A Pumper	525,000
8	Brush Attack	140,000
9	Utility Vehicle	85,000
10	Station - Palm Coast West	4,225,000
11	Fire Engine - Class A Pumper	525,000
12	Brush Attack	140,000
13	Utility Vehicle	85,000
14	Mini Station 251 Whiteview	975,000
15	Midi-Attack Engine	275,000
16	Mini Station 252 Belle Terre Blvd	975,000
17	Midi-Attack Engine	275,000
18	New Equipment for Additional Firefighters	311,750
19	Equipment for Expansion Related Fire Engines	667,603
20	Training Facility	3,500,000
21	Total Other Fire Department Equipment and Required Facilities	\$21,904,353
22	Total Future New Equipment, Vehicles, and Facilities	\$21,904,353

Footnotes:

[1] Amounts reflected as provided by the City.

# Table 5City of Palm CoastFire Rescue Services Impact Fee Study

### Allocation of Service Calls Among Customer Classes

Line		Number of Calls For Service [1]		
No.	Description	Total	Residential	Commercial
	Fiscal Year 2017			
1	Residential/Commercial Calls	7,188	5,652	1,536
2	Roads/Vacant Land Calls [2]	1,334	1,049	285
3	Total	8,522	6,701	1,821
	Eigenl Veer 2019			
1	Fiscal Year 2018	7 202	5 465	1 727
4	Residential/Commercial Calls	7,202	5,465	1,737
5	Roads/Vacant Land Calls [2]	1,264	959	305
6	Total	8,466	6,424	2,042
	Fiscal Year 2019			
7	Residential/Commercial Calls	7,179	5,486	1,693
8	Roads/Vacant Land Calls [2]	1,305	997	308
9	Total	8,484	6,483	2,001
	3-Year Average			
10	Total Calls by Class	25,472	19,608	5,864
11	Average Calls by Class	8,491	6,536	1,955
12	Percent of Calls by Class	100.00%	76.98%	23.02%

#### Footnotes:

[1] Amounts based on information provided by the City of Palm Coast Fire Department.

# Table 6City of Palm CoastFire Rescue Services Impact Fee Study

### Summary of Capital Costs to Provide Fire Rescue Services

Line		
No.	Description	Total Cost
	Recoupment Costs [1]	
1	Machinery & Equipment	\$1,282,894
2	Major Vehicles & Fire Fighting Equipment	5,118,564
3	Other Capital Equipment & Facilities	11,777,080
4	Total Recoupment Costs	\$18,178,539
	Proposed Capital Additions [2]	
5	New Equipment, Vehicles, and Facilities	\$21,904,353
6	Total Proposed Costs	\$21,904,353
	Additional Cost or Adjustments [1]	
7	Miscellaneous Adjustments	\$0
8	Less Historical Capital Grants Received	(1,460,743)
	-	
9	Total Additional Costs or Adjustments	(\$1,460,743)
	·	
10	Total Capital Costs	\$38,622,149

Footnotes:

[1] Amounts derived from Table 3.

[2] Amounts derived from Table 4.

# Table 7City of Palm CoastFire Rescue Services Impact Fee Study

#### **Design of Fire Rescue Services Impact Fee**

Line		Total		
No.	Description	System	Residential	Non-Residential
1	Total Capital Costs	\$38,622,149		
2	Less: Funds From Other Sources	0		
3	Total Capital Costs Recovered From Impact Fees	\$38,622,149		
	Allocation to Customer Classes			
4	Percent of Calls for Service [1]		76.98%	23.02%
5	Allocated Costs		\$29,731,305	\$8,890,844
	Total Equivalent Impact Fee Units [2]			
6	Residential Dwelling Units at Buildout		80,987	
7	Square Feet of Commercial Development at Buildout			14,896,672
8	Cost per Equivalent Impact Fee Unit		\$367.11	\$0.5968
9	Rounded Fee		\$367.00	\$0.59

#### Footnotes:

[1] Based on information provided by the City's Fire Department.

[2] Amounts shown represent net increase in total residential dwelling units and non-residential construction (square feet) anticipated to be constructed by buildout consistent with the capital expenditure projections for fire protection services.

	Residential	Non-residential [a]
Total Res. Units/Sq. Ft. of Development Fiscal Year 2020	39,163	7,203,693
Total Res. Units/Sq. Ft. of Development Estimated at Buildout	80,987	14,896,672

[a] Amount shown based on an estimate of approximately 184 sq. ft of commercial development for every 1 unit of residential development.

# Table 8City of Palm CoastFire and Rescue Impact Fee Study

#### Fire Rescue Impact Fee Comparison [1]

		Impa	Impact Fee	
Line		Single Family	Non-Residential	
No.	Description	Per Unit	Per Sq. Ft	
	City of Palm Coast			
1	Existing	\$223.38	\$0.2832	
2	Proposed	367.00	0.5900	
	Other Florida Government Agencies:			
3	City of Apopka	\$708.00	\$0.07 - \$0.87	
4	City of Clermont [2]	522.00	1.414	
5	City of Daytona Beach [3]	240.00	0.096421	
6	City of Deland	364.00	0.036 - 0.194	
7	City of Deltona [4]	307.50	0.123	
8	City of Holly Hill	254.98	0.04 - 1.52	
9	City of Leesburg [5]	180.00	0.1017	
10	City of Mount Dora	390.28	0.02365 - 1.99871	
11	City of Palm Bay	620.09	0.12614 - 0.82527	
12	City of Port Orange	270.00	0.20	
13	City of St. Augustine (St. Johns County) [6]	609.00	0.001 - 0.518	
14	City of Tavares	402.78	0.01313 - 1.91538	
15	Volusia County	293.73	0.15	
16	City of Winter Haven	387.69	0.127	
17	Other Florida Governmental Agencies' Average	\$396.43	\$0.4607	

#### Footnotes:

[1] Unless otherwise noted, amounts shown reflect impact fees in effect October 2019. This comparison is intended to show comparable charges for similar service for comparison purposes only and is not intended to be a complete listing of all rates and charges offered by each listed municipality.

[2] Assumes "Non-residential Average Demand" for non-residential class.

[3] Assumes a single family home of 2,000 - 2,999.99 square feet.

[4] Assumes a 2,500 square foot home at \$123.00 per 1,000 square feet.

[5] Assumes standard non-residential structure.

[6] Assumes a residential unit of 1,801 - 2,500 square feet.